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Tony Ray Nelson, Rickey E. Butler, Alan L.
Dukes, Donald R. Allen and Shawn B.
11 *Dandridge, and Class Counsel for the Class*

12 [Additional counsel on signature page.]

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16
17 IN RE SNAP INC. SECURITIES
18 LITIGATION

19 Case No. 2:17-cv-03679-SVW-AGR

20 **CLASS ACTION**

21 **JOINT STIPULATION REGARDING**
SETTLEMENT AND CASE
DEADLINES

22 This Document Relates To: All Actions.

23 Courtroom: 10A, 10th Floor
Judge: Hon. Stephen V. Wilson

This stipulation is entered into between Class Representatives Smilka Melgoza, on behalf of the Smilka Melgoza Trust U/A DTD 04/08/2014, Rediet Tilahun, Tony Ray Nelson, Rickey E. Butler, Alan L. Dukes, Donald R. Allen, and Shawn B. Dandridge (“Plaintiffs”), and Defendants Snap Inc. (“Snap”), Evan Spiegel, Andrew Vollero, Robert Murphy, and Imran Khan (“Defendants”) (collectively, the “Parties”).

WHEREAS, the Parties have reached a settlement agreement in principle to resolve all claims in this litigation on a class-wide basis;

WHEREAS, this case is currently set for trial to begin on March 24, 2020 (ECF No. 326) (“Trial Date”);

WHEREAS, this Court has set certain pretrial deadlines (ECF Nos. 109, 326), and the Local Civil Rules for the Central District of California likewise provide for certain pretrial deadlines (“Pretrial Deadlines”);

WHEREAS, on December 23, 2019, the Court granted Plaintiffs' Motion to Approve the Form and Manner of Class Notice (ECF No. 355), which directed Class Notice to be issued by January 17, 2020 (ECF No. 342-8) ("Class Notice Deadline," and together with the Trial Date and Pretrial Deadlines, the "Deadlines"); and

WHEREAS, the Parties request that the Court vacate all Deadlines to allow the Parties to prepare final settlement documentation and submit a motion for preliminary approval of the proposed class action settlement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the Court's approval, that:

1. All Deadlines, including the Trial date, are vacated.
2. Plaintiffs shall file a motion for preliminary approval of the proposed class action settlement on or before March 2, 2020.

1 **IT IS SO STIPULATED.**
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3

Dated: January 17, 2020

Respectfully submitted,

4 **KESSLER TOPAZ**
5 **MELTZER & CHECK, LLP**
6

/s/ Sharan Nirmul

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29 Dated: January 17, 2020

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ATTESTATION

Pursuant to Local Rule 5-4.3.4(2)(i), I, Sharan Nirmul, hereby attest that the other signatory listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Sharan Nirmul
SHARAN NIRMUL (Pro Hac Vice)